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NAME OF COMMITTEE (In Full)
WOMEN SPEAK OUT PAC

FEC IDENTIFICATION NUMBER
C00530766

Mailing Address 2800 Shirlington Rd
Suite 1200

City	State	ZIP Code
Arlington	VA	22206

October 19, 2020

Clyde Hinton
Reports Analysis Division
Federal Election Commission
1050 First Street, NE
Washington, DC 20463

Identification Number: C00530766

Reference: AUGUST MONTHLY REPORT (07/01/2020 - 07/31/2020)

Dear Mr. Hinton:

This response pertains to the Federal Elections Commission ("Commission") Reports and Analysis Division's ("RAD") Request for Additional Information ("RFAI") dated September 13, 2020, concerning the Women Speak Out PAC ("Committee") August Monthly Report. Your letter indicates that the Committee may have failed to timely file one or more of the required 48 hour report(s) for independent expenditures.

Regarding the independent expenditures identified in the RFAI letter, disseminated on July 24, 2020, paid to Headway Workforce Solutions Inc.: A 48 hour report was filed on July 30, 2020. According to Regulation 11 CFR 104.5(g)(1), this report was filed timely following the requirement that a 48 hour report is required each time a subsequent independent expenditure related to the same election aggregate \$10,000 or more. The total estimated spend to headway Workforce Solutions, Inc. for the independent expenditure disseminated July 24, 2020 was \$4,161.02., thus not requiring a 48 hour report. Additional independent expenditure paid to Tradewinds Consulting, Inc. disseminated July 29, 2020 for an estimated total of \$6,325. The aggregate of both estimated independent expenditures paid to Headway Workforce Solutions, Inc. and Tradewinds Consulting, Inc. exceeded \$10,000 and a 48 hour notice was timely filed on July 30, 2020.

Regarding the expenditures disseminated on July 1, 2020, paid to i360 for a total of \$227.88, that was inadvertently submitted to the Commission outside of the requisite 48-hour reporting period. This error was based upon a misunderstanding of the Commission's regulations and unintentional human error. In light of this oversight, the Committee has made personnel and procedural changes to avoid such an occurrence in the future, and has engaged with our campaign finance counsel regarding best practices, as it of utmost importance to the committee to be fully compliant with Commission regulations.

Please do not hesitate to reach out with any additional questions regarding this matter.

Sincerely,

Jennifer Gross
Treasurer